Chemistry, Manufacturing and Controls

CBER 101

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Overview

- □ Reviewer's Responsibilities
- □ Differences Between Biologics and Chemical Drugs
- □ IND Phase 1 Issues
- □ IND Development (Phase 2, 3)
- □ BLA Issues, Format & Content
- □ Other Considerations
- □ Post-Approval Changes
- □ Acknowledgements/ Contacts
- □ References

CMC Reviewer - Major Responsibilities

- □ WHO -
 - » Reviewer or researcher/ reviewer
 - » Background
 - Biologists, Chemists/Biochemists, Microbiologists, Immunologist & Others
 - Variety of expertise
- □ WHERE -
 - » OCGT, OBRR, OVRR, OTRR, OCBQ (DMPQ)
- □ WHAT -
 - » Review of CMC information submitted in IND, BLA
 - » Review of "CMC-related information" in IND, BLA
 - » Review of CMC information on facility inspection
 - » CMC reviewer <u>chairs</u> BLA Review Committee (for new biologics, manufacturing supplement)

Vaccines Allergenic Extracts **Blood Derivatives** Monoclonal Antibodies Blood Biotech Derived Components Therapeutics | Whole Somatic **Blood** Cell & Gene **Devices** Therapy **Tissues** Xenotransplantation

SOME PRODUCTS AT CBER TODAY TOMORROW

Monoclonal Antibodies

Therapeutic Vaccines

Therapeutic Vaccines

rDNA Therapeutic Proteins

Blood Derivatives Blood Derivatives

and recombinant analogues and recombinant analogues

Ancillary products

Ancillary products

Major Differences Between Chemical Drugs and Biological Products

<u>Parameter</u>	Chemical Drug	Biotech Product
Manufacturing	Chemical Synthesis (defined composition)	Living sources Complex process Sensitive to change & Environmental influences
Biol. Contaminants	None (Rare)	Subject to contamination Viral/bacteria/fungal/TSE
Structure Active Ingredient	Defined Defined (early)/Single	Multiple molecular species Heterogeneous

Major Differences Between Chemical Drugs and Biological Products

<u>Parameter</u>	Chemical Drug	Biotech Product
Impurities	Defined Standards/Specs.	Difficult to define and quantitative
Characterization (methods of analysis)	Sensitive/Standards/ Discriminating	Limitations activity/cont/impurities

Implications for CMC

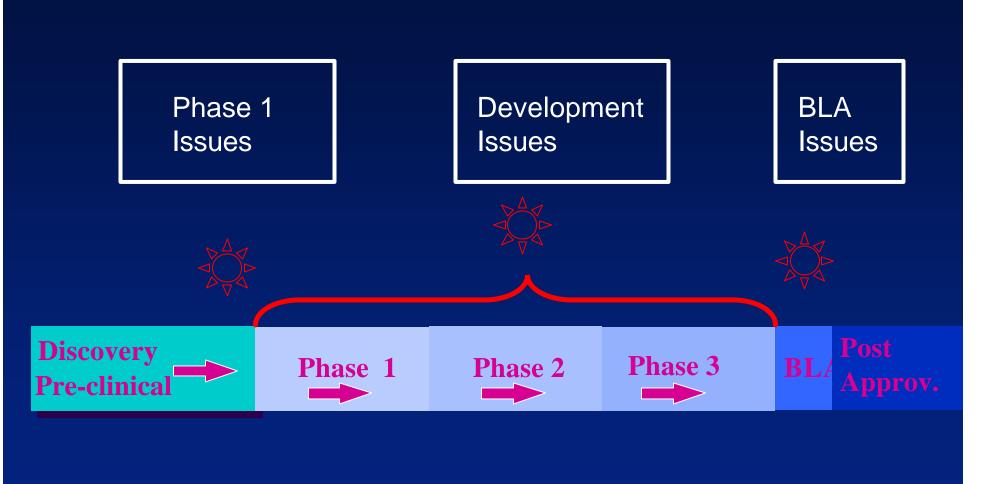
- » Requires thorough description, characterization, and controls starting with source material
- » Description and evaluation of manufacturing changes during development for potential product impact
 - Difficult to distinguish quality change that can impact safety
 - Product Comparability
- » Greater reliance on process validation/ process control
- » Greater emphasis on the Drug Substance
- »Some "cGMP" information is submitted and reviewed in context with other information submitted in the IND & BLA

Product Development and Regulation - CBER Philosophy



- □ Regulation Goal: Balanced, Flexible, Responsive
 - » Assure the safety and rights of subjects
 - » Protect the public health
 - » Not impede technological innovation & product development
- □ Influences
 - » Available scientific knowledge, pre-clinical, clinical knowledge & experience
 - » Scientific Research
 - » Crises/ tragic events
- □ Appropriate Risk Assessment

Overview Product Lifecycle



General Principles

"The amount of information on a particular drug that must be submitted in an IND to assure the accomplishments of the objectives... {safety & quality} ...depends upon such factors as the novelty of the drug, the extent to which it has been studied previously, the known or suspected risks and the developmental phase of the drug." [21 CFR, 312.22(b)]

General Principles

"Although in each phase of the investigation sufficient information is required to be submitted to assure the proper identification, quality, purity, and strength of the investigational drug, the amount of information needed to make that assurance will vary with the phase of the investigation, the dosage form, and the amount of information otherwise available." [21 CFR 312.23 (a)(7)(i)]

Phase 1

General Principles

"FDA's primary objectives in reviewing an IND are, in all phase of the investigation, to assure the <u>safety</u> and rights of subjects, ... FDA's review of Phase 1 submissions will focus on <u>assessing the safety of Phase 1</u> investigations..., [21 CFR, 312.22(a)]

Phase 1 Considerations

- □ CMC safety issues as they relate to quality aspects
- □ What is the risk for human subjects? Are there any signals?
- □ Product class and individual products affect, to some extent, the type and extent of information needed to assess safety
- How some information is reported may influence the type and extent of other information that should be provided
- □ Unique issues associated with specific products
 - » Known labile product
 - » Substantial time elapsed from manufacture and testing

- Description of the manufacturing process Drug
 Substance & Drug Product
 - » Method of preparation, including:
 - complete description covering source, expression methods, materials and components, culture, purification, formulation, finishing, storage periods and conditions
 - establish safety-related acceptance criteria (e.g., critical components, ancillary products, lot release DS/DP)
 - description of differences in manufacturing for DS & DP for clinical studies versus preclinical studies
 - » Adequate description of process controls for process steps that affect safety (e.g., virus inactivation, vaccine attenuation, aseptic filling)

- □ Source origination & characterization (animals, humans, cell lines, cell banks, viral seeds)
- □ Appropriate description of the Drug Substance
 - » Characterization information (structural, physiochemical, immunological)
- □ Appropriate testing
 - » Description of tests, analytical procedures & acceptance criteria
 - safety testing throughout process
 - DS & DP release testing (i.e., identity, purity, potency, strength)
 - testing results on preliminary/ available lots (e.g., toxicological studies to be used in clinical studies)

- Endogenous virus testing
- Prevention and control of contamination by adventitious microbial agents (viruses, bacteria, fungi, mycoplasma) & TSE agents
 - » Source Screening/ Testing
 - » Raw materials of human or animal origin
 - » Testing at appropriate stages of production
 - » Demonstrated clearance (inactivation/removal) for viruses
 - » Control cGMP's

- □Ruminant-derived materials (e.g., bovine origin)
 - » Assure material from BSE-free country [USDA 9 CFR 94.18]
 - » Identify country of origin & tissue source in submission
 - » Maintain traceable records
 - » Also test for viral agents [e.g., 9 CFR]

- Information to support stability during toxicological studies and planned clinical study
 - » Description of stability testing
 - » Preliminary/ available stability test results
 - » Establish a real time stability protocol
 - » Perform accelerated stability (Phase 2/3)

Testing - Sterility

- □ Sterility of the Cell Banks, Product, and Placebo must be demonstrated by testing for viable organisms (bacteria & fungi).
- □ Recommend following 21CFR 610.12
- What about cell therapies, tissues, & short-lived radiopharmaceuticals?

Testing - Sterility (cont.)

- Possible exceptions for cell therapies, tissues, & shortlived radiopharmaceuticals (discuss options with CBER):
- □ Cell therapies
 - » Gram-stain/ Follow-up with culture test
 - » Action plan-based upon subsequent positive contamination in sterility test after cell administration
 - `Patient/physician notification, investigation, speciation
- Process validation -- cell therapies & radiopharmaceuticals

Testing - Mycoplasma

- ☐ Test for culturable and non-culturable
- □ Recommend 21 CFR 610.30 for culture test
- □ Options for non-culture test:
 - » Hoechst stain
 - » PCR

Testing Endotoxin (pyrogenicity)

□ Options

- » Rabbit-pyrogenicity test (21CFR 610.13(b)) or
- » Limulus Amebocyte Lysate (LAL) test

□ Acceptable levels (LAL)

- » 5 Endotoxin units (EU) per kg body weight per hour for parenteral administration
- » 0.2 EU per kg body weight per hour for intrathecal administration

cGMPs in Development

- □ Safety-related elements of cGMP's need to be in place before Phase 1, including
 - » Adequate documentation (traceability) and facilities
 - » Sterility assurance
 - » QA/QC oversight
 - » Virus Attenuation/ Toxin inactivation
- CGMPs develop with process and resulting product
- □ Control is expected to increase as development proceeds

Recent Examples of "cGMP" Information Submitted in IND

☐ Gene Therapy

- » Description of an adequate QA/QC program in place
- » Description of segregation and cleaning procedures to prevent cross-contamination from production of multiple GT vectors in the same facility

□ Cellular Therapy

» Description of tracking & segregation procedures for autologous cells to assure patient receives correct cells

IND Clinical Hold

"Human subjects are or would be exposed to <u>an</u> <u>unreasonable and significant risk of illness or injury</u>." [21 CFR 312.42 (b) (1) (i)]

"The IND does not contain <u>sufficient information</u> required under 312.23 to assess the risks to <u>subjects</u> of the proposed studies." [21 CFR 312.42 (b) (1) (iv)]

IND Development (Phase 2 & 3)

Development Goal

- □ GOAL: Licensing a Biologic Product
- □ CMC GOAL: Developing an established manufacturing process assuring consistent production of a quality product.
- Demonstrating comparability for manufacturing changes
 - » Careful attention is required to evaluate changes made during development
 - » Comparability changes post/during pivotal trial
- Establishing the relationship between DS and DP used in clinical studies (especially pivotal studies - phase 3) and the quality characteristics and attributes of the DS and DP to be approved

Development of CMC Information

Safety Information Development Source characterization DS & DP **Specifications** Characterization Raw materials qual. Manf. Process DS/DP Characterization **Assay Development Optimization** (Reference standards (Control & Validation) Testing or clearance of Validation) impurities, contaminants Des. of manf. process Stability Phase III Process control esp. for Phase II safety processes (e.g., virus clearance) **Phase I Discovery** cGMP's **Pre-clinical**

Phase 2 & 3

- Manufacturing Changes
- □ Lot-to-lot consistency
- □ Progressive Process Validation
- □ Progressive Analytical Methods Validation
- □ Refining Specifications

Manufacturing Changes

- □ Document the changes in an amendment.
- Describe the new method (highlight differences)
- □ Explain the reasons for implementing the change
- □ Perform side-by-side analyses to compare the "new" with the "old".
- □ Consider potential impact on safety (e.g., Need to perform viral clearance studies)
- □ Keep retention samples!!!

BLA Issues, Content, Format

Assuring Product Control & Quality

PROCESS



PRODUCT

Source/ Raw materials testing

In-process Testing

Validation

cGMPs

Characterization

Specifications

Release Testing

Stability Testing

Applicable Regulations

- □ Part 600 Establishment Standards, Establishment Inspection, Reporting of Adverse Experiences
- □ Part 601 Licensing
- □ 21 CFR 601.2 Applications for Biologics Licenses
 - "To obtain a biological license under section 351 of the PHS Act for any biological product..."
 - "...manufacturer shall submit an application to the Director, CBER..."
 - "...data meet the prescribed requirements of safety, purity, potency..."
 - "... full description of the manufacturing method;data establishing stability of the product throughout the dating period; samples representative of the product..."summaries of the results of tests performed on the submitted samples...

Applicable Regulations

- » "Approval of BLA application or issuance of a biologics license shall constituent a determination that the <u>establishment</u> and the <u>product</u> meets applicable requirements too ensure continued safety, purity and potency of the product"
- » Establishments meet applicable GMP requirements 21 CFR 210, 211, 600, 606, 820
- □ 21 CFR 610. General Biological Standards
 - » Tests for sterility, potency, identity, purity, product specific tests
 - » 21 CFR 610.2 Lot Release

Applicable Regulations

- □ Additional standards for product specific classes
 - » Part 640 human blood and blood products
 - » Part 660 diagnostic substances of laboratory tests
 - » Part 680 miscellaneous products
- "Specified Products" exempt from select establishment standards and some general biological standards

CMC Guidance

"WHAT" "HOW"

ICH "Technical Guidance"
FDA "Technical Guidance"

"WHERE"

Common
Technical
DocumentQuality
& FDA guidance

"WHERE & HOW

FDA Submission CMC Information Content & Format– *Product Class*

Applicability of CTD Format

Vaccines

Blood (Plasma)

Derivatives

Not Applicable

Blood Components

Whole Blood

Blood Related Devices

Tissues

Allergenic Extracts

"Scope of CTD-Q"

Therapeutic DNA-derived proteins

Monoclonal Antibodies

Therapeutic DNA Plasmids

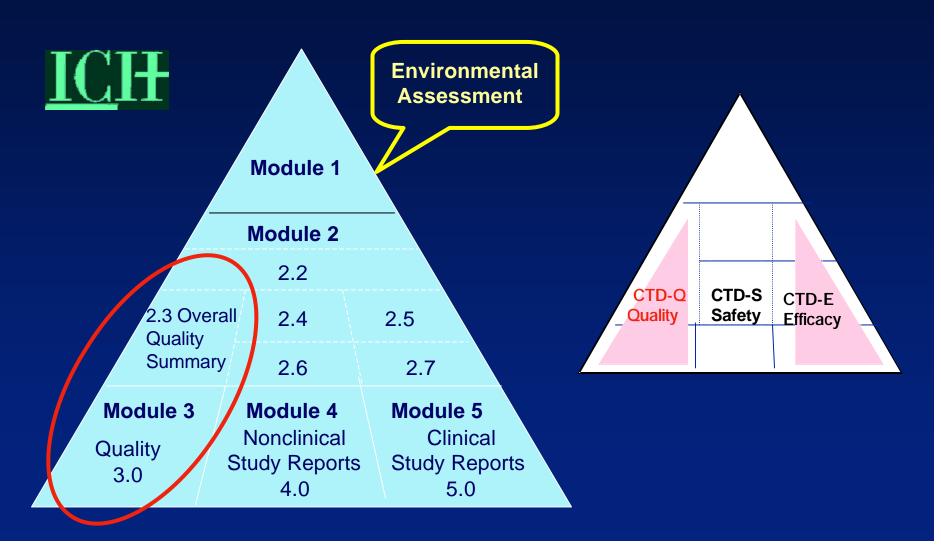
Synthetic Peptides

Somatic

Cell & Gene
Therapy

Xenotransplantation

Common Technical Document



Module 2.3: Quality Overall Summary

- □ An overview written summary following the outline and scope of the Body of Data (Module 3)
- Critical key parameters of the product should be discussed
- □ No new information should be included that is not contained in Module 3
 - » Most of the information including tables and figures can be imported directly from Module 3

Module 2.3: Quality Overall Summary

- Non-Clinical and Clinical Overviews:
 - contain a discussion and justification on the risk/benefit of the product;
- Quality Overall Summary:
 - it is a true summary
 - * the justification is already included in the "Body of Data" (Module 3)

Overview of CTD Module 3

- □ 3.1 Module 3 Table of Contents
- □3.2 Body of Data
 - » 3.2.S Drug Substance
 - » 3.2.P Drug Product
 - » 3.2.A Appendices
 - » 3.2.R Regional
- □ 3.3 Literature References

3.2.S Drug Substance

- □ 3.2.S.1 General Information
- □ 3.2.S.2 Manufacture
- □ 3.2.S.3 Characterization
- □ 3.2.S.4 Control of Drug Substance
- □ 3.2.S.5 Reference Standards or Materials
- □ 3.2.S.6 Container Closure System
- □ 3.2.S.7 Stability

3.2.S.2 Manufacture

- □ 3.2.S.2.1 Manufacturers
- □ 3.2.S.2.2 Description of the Manufacturing Process and Process Controls
- □ 3.2.S.2.3 Control of Materials
- □ 3.2.S.2.4 Control of Critical Steps and Intermediates
- □ 3.2.S.2.5 Process Validation and/or Evaluation
- □ 3.2.S.2.6 Manufacturing Process

 Development

- □ 3.2.S.2.2 Description of the Manufacturing Process and Process Controls
 - » Description of entire process
 - » Description of pooling, reprocessing
 - » Focus on critical and noncritical processes, procedures and controls
 - » Reference to other sections with additional detail

□ 3.2.S.2.3 Control of Materials

- » Information on all raw materials and components
 - Information to substantiate appropriate quality and suitability for use
- » Control of Source/Starting Materials
 - Master & Working Cell/ Seeds Banks, Source Plasma (Donor Testing)
 - -Description, characterization and stability
 - Description and analysis of genetic construct

- □ 3.2.S.2.4 Control of Critical Steps and Intermediates
 - » Identification of critical process controls, acceptance criteria/ limits with supporting data
 - » Information on all intermediates
- □ 3.2.S.2.5 Process Validation and/or Evaluation Biotech
 - » Information on validation of critical steps
 - Propagation/ Fermentation, Harvest, Purification
 - Revalidation studies as a result of process/scale changes
 - Aseptic Processing
 - Microbiology steps

- □ 3.2.S.2.6 Manufacturing Process Development
 - » Description of process development
 - » Assessment of potential for change(s) to impact the Drug Substance
 - » Comparative analytical studies of pre/post change
 - » Comparability assessment

Comparability

- Demonstrate product comparability between a biological product made after a manufacturing change and a product made before implementation of the change
- Most relevant for Phase 3 and post phase 3 changes
- "FDA may determine that two products are comparable if the results of comparability testing demonstrate that the manufacturing change does not affect safety, identity, purity or potency."

FDA Guidance Concerning Demonstration of Comparability of Human Biological Products, Including Therapeutic Biotechnology-derived Products [April, 1996]

3.2.S.3 Characterization

- □ 3.2.S.3.1 Elucidation of Structure and Other Characteristics
 - » Specified Products
 - Desired Product
 - Product-related substances,
- □ 3.2.S.3.2 Impurities
 - » Process-related impurities
 - » Product-related impurities

3.2.S.4 Control of Drug Substance

- □3.2.S.4.1 Specification
- □3.2.S.4.2 Analytical Procedures
- □3.2.S.4.3 Validation of Analytical Procedures
- □3.2.S.4.4 Batch Analyses
- □3.2.S.4.5 Justification of Specification

3.2.S.7 Stability

- □ Information and data on real time, accelerated, and stress stability studies
- □ Post Approval Stability Protocol and Stability Commitments

3.2.P Drug Product

- □ 3.2.P.1 Description and Composition of the Drug Product
- □3.2.P.2 Pharmaceutical Development
- □3.2.P.3 Manufacture
- □ 3.2.P.4 Control of Excipients
- □ 3.2.P.5 Control of Drug Product
- □ 3.2.P.6 Reference Standards or Materials
- □ 3.2.P.7 Container Closure System
- □3.2.P.8 Stability

Pharmaceutical Development

(CTD-Q Definition)

- □ Information on the development studies conducted to establish that the dosage form, the formulation, manufacturing process, container closure system, microbiological attributes and usage instructions are appropriate for the purpose specified in the application.
- Additional, this section should identify and describe the formulation and process attributes (critical parameters) that can <u>influence batch reproducibility</u>, <u>product performance and drug product quality</u>

3.2.P.2 Pharmaceutical Development

- □ 3.2.P.2.1 Components of the Drug Product
- □3.2.P.2.2 Drug Product
- □ 3.2.P.2.3 Manufacturing Process Development
- □ 3.2.P.2.4 Container Closure System
- □ 3.2.P.2.5 Microbiological Attributes
- □ 3.2.P.2.6 Compatibility

3.2.A Appendices

- □3.2.A.1 Facilities and Equipment
- □3.2.A.2 Adventitious Agents Safety Evaluation
- □3.2.A.3 Novel Excipients

3.2.A.1 Facilities and Equipment

- □Elimination of Establishment Licensing Application
- □The manufacturing process includes facilities and equipment
- □This information is reviewed in context with other information in the application. Other aspects also reviewed on inspection
- □Type and extent of information will vary with the product class covered in inspection presentation

3.2.A.2 Adventitious Agents Safety Evaluation

- □ Single compendium of all studies assessing the safety of the drug substance and drug product from contamination with adventitious agents
- □ Viral & non-viral (bacteria, mycoplasma, fungi, TSE agents)
- □ Overall picture for assessors.
- □ Collates information that would be spread throughout the BLA.
- □ ICH guidance for technical requirements [Q5A, Q5D]

3.2.R Regional Information

- □3.2.R Regional Information
 - » Executed Batch Record (USA Only)
 - » Comparability Protocols (USA Only)

Post Approval Commitments

- »Outstanding issues that cannot be resolved prior to approval of application
- » Discussed during review
- »Specified in approval letter with submission time commitment

Other Considerations

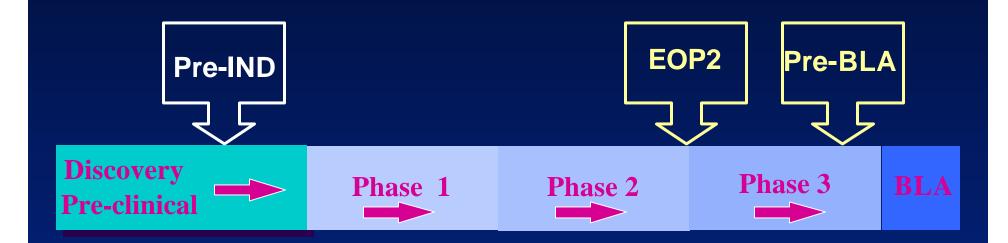
BLA Speed Bumps

- □ Demonstrating Product Comparability
- □ Process Validation Studies
- □ Setting Specifications
- □ Stability Studies
- □ Demonstrating Consistent Manufacture

Master File

- Master File (primarily Type 2 & Type 5)
- ☐ Provides supporting information to IND or IDE
- □ Provides supporting information to BLA
- ☐ The regulations governing Master Files are found at 21 CFR 314.420

Proper Planning – Utilize IND Meetings*



*Other meetings possible (e.g., Fast track, Phase 3 follow-up)

Post-Approval

Changes to an Approved Application (21 CFR 601.12, July 24, 1997)

- □ FDAMA Section 116
- □ Changes to an approved application
 - » product, production process, quality control, equipment, testing, facilities, labeling
- □ Potential for change to have an adverse effect on a products identity, strength, quality, purity, or potency as they may relate to its safety or effectiveness.
- □ Potential determines reporting categories

Post Approval Reporting Categories

- □ Prior Approval Supplement (PAS)
 - » substantial potential
 - » Distribute product upon supplement approval
- □ Changes Being Effected 30 days (CBE-30)
 - » moderate potential
 - » Distribute product 30 days after supplement receipt
 - » Review continues
- □ Changes Being Effected (CBE)
 - » moderate potential
 - » Distribute product upon supplement receipt
 - » Review continues

Post Approval Reporting Categories

- ☐ Annual Report (AR)
 - » minimal potential
 - » release product upon completion of study

3.2.R. Regional Information Comparability Protocol (U.S. only)

- □ Location for submission of comparability protocol for post-approval changes (e.g., new WCB qualification, product stability protocol, establishing new lot of reference standard, specific process optimization)
- Mechanism to demonstrate "...the lack of adverse effect for a specified type of manufacturing change..."
 - » Detailed description of proposed change(s)
 - » Specific tests, methods, and studies to be performed
 - » Acceptable results to be achieved
- May result in reduced reporting category and expedited product distribution

Guidance (BLA)

- □ Guidance For the Submission of Chemistry, Manufacturing and Controls Information and Establishment Description for Autologous Somatic Cell Therapy Products (1/10/1997)
- □ Guidance for Industry for the Submission of Chemistry, Manufacturing, and Controls Information for a Therapeutic Recombinant DNA-Derived Product or a Monoclonal Antibody Product for In Vivo Use (8/1996)

Summary

- □ CBER Flexible regulatory approach
 - » Different information (type and extent) is sometimes necessary for addressing specific IND CMC issues for different biologic product classes and even individual products within a class
- □ Newer therapies/ technologies generally result in a greater number and different hold/ product development issues than more established biologics
- □ Sponsors with minimal regulatory experience & product/ process understanding generally experience greater delays in product approval
- □ Elements of cGMP need to be in place before Phase

Suggestions

- "Know thy process and thy product"
- □ Reserve sufficient DS & DP retain samples
- □ Document everything! (integral part of cGMP's)
- □ Consult CBER guidance (not a be all/ end all)
- □ Take advantage of the opportunity to interact with CBER
- □ Listen and respond to CBER's comments
- Pay attention to CBER's non-hold CMC comments for further development
- Continue to partner throughout development, approval, post approval especially with new products and emerging technology

Acknowledgements/Contacts

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Division of Monoclonal Antibodies, OTRR, CBER

Darin Weber, Ph.D.

Division of Cell and Gene Therapy, OCTGT, CBER (Cellular Therapy)

References

INDs

- □ The regulations governing INDs are found at 21CFR 312 and those specific to CMC content are in section 312.23(a)(7).
- □ Guidance Documents on the CBER Website:
- Guidance for Industry: Content and Format of Investigational New Drug Applications (INDs) for Phase 1
 Studies of Drugs, Including Well-Characterized, Therapeutic, Biotechnology-derived Products
- Draft Guidance for Industry: INDs for Phase 2 and 3 Studies of Drugs, Including Specified Therapeutic Biotechnology-Derived Products, Chemistry Manufacturing and Controls Content and Format
- Guidance for Industry: IND Meetings for Human Drugs and Biologics; Chemistry, Manufacturing and Controls Information

IDEs

- □ The regulations governing IDEs are found at 21CFR812 and those specific to CMC content are in section 812.20 (b)(3) & 820.70-75.
- □ Guidance Documents on the FDA Website:
 - » Guidance on IDE Policies and Procedures (CDRH)

Guidance (IND)

Guidance for Industry: Content and Format of Investigational New Drug Applications (INDs) for Phase 1 Studies of Drugs, Including Well-Characterized, Therapeutic, Biotechnologyderived Products

Draft Guidance for Industry: INDs for Phase 2 and 3 Studies of Drugs, Including Specified Therapeutic Biotechnology-Derived Products, Chemistry Manufacturing and Controls Content and Format

Guidance for Industry: IND Meetings for Human Drugs and Biologics; Chemistry, Manufacturing and Controls Information

ICH Quality Guidance

- □ Applicable to Specified Biologics (May be applicable to other biologics)
 - » Q5A: Viral safety evaluation
 - » Q5B: Genetic stability of construct
 - » Q5C: Stability testing DS/ DP
 - » Q5D: Cell substrates
 - » Q6B: Specifications

□Generally Applicable to Specified Biologics

(May be applicable to other biologics)

- » Q2A & Q2B Analytical Validation
- » Q1AR Stability testing
- » Q1C Photostabiltiy testing
- » Q1E Evaluation of Stability Data (Step4)

Guidance (BLA)

- □ Guidance for Industry For the Submission of Chemistry,
 Manufacturing and Controls and Establishment Description
 Information for Human Blood and Blood Components Intended for
 Transfusion or for Further Manufacture and For the Completion of
 the Form FDA 356h "Application to Market a New Drug, Biologic
 or an Antibiotic Drug for Human Use" (5/10/1999)
- □ Guidance for Industry On the Content and Format of Chemistry, Manufacturing and Controls Information and Establishment Description Information for an Allergenic Extract or Allergen Patch Test (4/23/1999)

Guidance (BLA)

- □ Guidance for Industry: Content and Format of Chemistry, Manufacturing and Controls Information and Establishment Description Information for a Biological In Vitro Diagnostic Product (3/8/1999)
- □ Guidance for Industry: For the Submission of Chemistry,
 Manufacturing and Controls and Establishment Description
 Information for Human Plasma-Derived Biological Products,
 Animal Plasma or Serum-Derived Products (2/17/1999)
- Guidance for Industry: Content and Format of Chemistry, Manufacturing and Controls Information and Establishment Description Information for a Vaccine or Related Product (1/5/1999)